

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

CHIRAG SHAH,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION No. 1:13CV1481
)	
SOUTHWEST AIRLINES, et al)	
)	
Defendant.)	

**Declaration of Plaintiff's Attorney Thomas R. Breeden in Support of
Motion *In Limine* for Certain Pre-trial Orders**

Thomas R. Breeden, an attorney at law, hereby declares under penalties of perjury that the following statements are true to the best of his knowledge, information, and belief:

1. I am an attorney licensed to practice in the Commonwealth of Virginia, and I am admitted to practice before this Court.
2. I am an attorney of record for the Plaintiff in this action.
3. I am making this Declaration for the purpose of attaching an article about the Boston Marathon Bombing, which occurred on April 15, 2013, originally published in the New York Times the day of the attack. The article is attached to this Declaration as **Exhibit A**.
4. I also attach to this Declaration, as **Exhibit B**, Southwest Airlines Co.'s Expert Disclosure dated April 18, 2014.

5. For reasons more fully explained in the accompanying Memorandum of Law, Plaintiff respectfully requests the Court to issue the pre-trial orders listed in the accompanying Notice of Motion, and for such other relief as the Court may find just and equitable.

Dated: July 11, 2014

CHIRAG SHAH
By Counsel

_____/s/
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CERTIFICATE OF SERVICE

I certify that on July 11, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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